

***IN THE DISTRICT COURT OF THE UNITED STATES***

***for the Western District of New York***

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**MAY 2018 GRAND JURY  
(Impaneled 05/04/2018)**

**THE UNITED STATES OF AMERICA**

-vs-

**INDICTMENT**

**CARLOS FRANCISCO LOPEZ  
a/k/a playfulchaos**

**Violations:**

Title 18, United States Code,  
Sections 2422(b) and 2423(a)

(2 Counts and Forfeiture Allegation)

**COUNT 1  
(Attempted Enticement of a Minor)**

**The Grand Jury Charges That:**

Between on or about January 15, 2018, and on or about January 19, 2018, in the Western District of New York, and elsewhere, the defendant, CARLOS FRANCISCO LOPEZ a/k/a playfulchaos, using facilities and means of interstate and foreign commerce, that is, a cellular telephone and the internet, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, that is, Victim 1, a person known to the Grand Jury, to engage in sexual activity for which any person can be charged with a criminal offense.

**All in violation of Title 18, United States Code, Section 2422(b).**

**COUNT 2**  
**(Transportation of a Minor)**

**The Grand Jury Further Charges That:**

Between on or about January 15, 2018, and on or about January 19, 2018, in the Western District of New York, and elsewhere, the defendant, CARLOS FRANCISCO LOPEZ a/k/a playfulchaos, did knowingly transport, and attempt to transport, an individual who had not attained the age of 18 years, that is, Victim 1, a person known to the Grand Jury, in interstate commerce from New York to California, with the intent that Victim 1 engage in sexual activity for which any person could be charged with a criminal offense.

**All in violation of Title 18, United States Code, Sections 2423(a), 2423(e), and 2.**

**FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

As a result of the offenses alleged in this Indictment, the defendant, CARLOS FRANCISCO LOPEZ a/k/a playfulchaos, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to the following:

- 1) One LG cellular telephone, model LG-B540, serial number 510CYTB613681; and
- 2) One Samsung cellular telephone, model SM-J327T, serial number RV8JB1Z7H1K.

**All pursuant to Title 18, United States Code, Section 2428.**

DATED: Buffalo, New York, July 12, 2018.

JAMES P. KENNEDY, JR.  
United States Attorney

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A TRUE BILL:

s/FOREPERSON